

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-D and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to prosecute their actions against them.

Respectfully:

/s/ Barbara R. Binis

Barbara R. Binis

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Dated: June 17, 2015

EXHIBIT A – BERTRAM AND GRAF

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-23718	Nancy Talbot, Richard Talbot v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-29816	Vicki Gillman, Roger Gillman v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-30596	Helen Robertson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – HODGES LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-02626	Beth Burger, Carl Dean Burger v. Ethicon, Inc., American Medical Systems, Inc.

EXHIBIT C – MCGLYNN GLISSON & MOUTON

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-08264	Mary Annette Trader, Richard Trader v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-25142	Joanne Marquardt, Leonard Marquardt v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/Barbara R. Binis